

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT

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YENFRI RAMIREZ,

Petitioner,

-against-

MARILYN KOPP,

Respondent.

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**MOTION ASKING FOR AN
EXTENSION TO FILE AN
APPELLATE BRIEF**

Docket No. 24-cv-7522(LGS)(RWL)

1. I, Yenfri Ramirez, am the Petitioner in the above caption proceeding pro-se, and under the penalty of perjury of the United States say the following:

2. On or about April 10, 2025, I received a copy of the Respondent's Opposition to my writ of habeas petition.

3. At this moment I am in the process to prepare and file the a Traverse to respond to the Respondent. Nevertheless, I am going to need the assistance of a law library clerk, since I lack any legal knowledge to do it myself. Nevertheless, since this facility is operating on a semi-lockdown schedule, access to it is limited, and this clerk have other inmates assigned to his case log with deadlines to meet, coupled with the complexity of the legal issues involved in Petitioner's case, the Plaintiff will need a 45 days extension of time to file an adequate Traverse to this Court.

WHEREFORE, in order to allow the Petitioner a fair opportunity to present his constitutional claims before this Court, Plaintiff humbly ask this Court to grant the relief requested herein, and any other relief that this Court may deems just and proper.

Dated: April 21, 2025

Respectfully submitted,


Yenfri Ramirez 14-A-2604

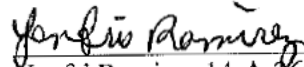
PROOF OF SERVICE

I, Yenfri Ramirez, proceeding pro-se, declare under Penalty of Perjury of the United States, that on April 21, 2025, I mailed a copy of Plaintiff's Motion Asking for an Extension of Time to File a Traverse, to the Attorneys representing the Defendants in this action at the following addresses:

Darcer D. Clark
District Attorney of Bronx County
198 East 161st Street
Bronx, New York 10451

Dated: April 21, 2025.

Respectfully submitted,



Yenfri Ramirez 14-A-2604

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Petitioner's "traverse" brief currently is due to be submitted by July 7, 2025, almost three months from when Petitioner received the Respondent's opposition. That period of time is quite lengthy, and it is not apparent from Petitioner's request that he is aware of already having that period of time available to him. Accordingly, the Court deems it premature to grant a 45-day extension. The application therefore is denied without prejudice to Petitioner making a later application for an extension in the event he believes he will not be able to meet the July 7, 2025 deadline.

SO ORDERED:

4/30/2025


HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE